

DOCKETED

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Project Title:	Mission Rock Energy Center
TN #:	213893
Document Title:	Mission Rock Energy Center, Data Request No. 115 with Guidance
Description:	Cultural Resources Data Request 115 along with Staff General Guidelines for Conducting Historical Resource Surveys
Filer:	Mike Monasmith
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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CALIFORNIA ENERGY COMMISSION

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October 4, 2016

Mitch Weinberg
Calpine Company
4160 Dublin Boulevard, Suite 100
Dublin, CA. 94568

RE: MISSION ROCK ENERGY CENTER (15-AFC-02) DATA REQUEST No. 115

Dear Mr. Weinberg;

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data request, No. 115. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, and 4) assess potential mitigation measures.

This request is being made in the area of Cultural Resources. To assist the process, staff developed instructions for conducting historical resource surveys in the form of a guidance document, submitted concurrently with data request No. 115. The guidance document represents the steps sufficient to gathering the information requested by staff in data request No. 115. Written response to the enclosed data request is first expected in the form of a draft research design due to the Energy Commission staff for review on or before October 24, 2016. Completion of all remaining components of data request No. 115 shall be at a later date as may be mutually agreed upon.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to both Commissioner Karen Douglas, Presiding Committee Member for the Mission Rock Energy Center, and me, within 20 days of receipt of this letter. The notification should contain the reasons for not providing the information, the need for additional time, and the grounds for any objections. If you have any questions, please call me at (916) 654-4894, or E-mail me at: mike.monasmith@energy.ca.gov.

Sincerely,

Mike Monasmith
Siting Project Manager

Enclosure: Data Request No. 115
CEC Staff General Guidelines for Conducting Historical Resource Surveys

**MISSION ROCK ENERGY CENTER (15-AFC-02)
DATA REQUEST No. 115**

Table of Contents

Background.....3

Data Request No. 115..... 4

General Guidelines for Conducting Historical Resource Surveys.....6

Technical Area: Cultural Resources

Authors: Matthew Braun and Sean de Courcy

BACKGROUND

On August 1, 2016, Calpine Mission Rock Energy Center, LLC (hereafter the applicant), filed objections to most of Cultural Resources staff's data requests Set 1 (Data Request 30-32, 35-47, 48-52, and 53-58) on the basis that the information was not reasonably available or necessary for staff to complete the environmental analysis of the Mission Rock Energy Center (Mission Rock) project (TN# 212531). These requests were designed with the goal of documenting contributing resources to the Santa Clara Valley Rural Historic District (historic landscape). Staff and the applicant discussed these requests at the workshop held August 26, 2016, but were not able to reach mutual agreement. Staff and applicant agreed it would be productive to hold a follow-up workshop to further discuss staff's data requests related to cultural resources, which was held on September 23, 2016. Staff and the applicant agreed it would be acceptable for staff to withdraw its previous data requests, make several adjustments to the survey area for cultural resources, and submit a superseding Data Request (115) to help the applicant better understand the information staff requires to complete the environmental analysis.

Survey Area

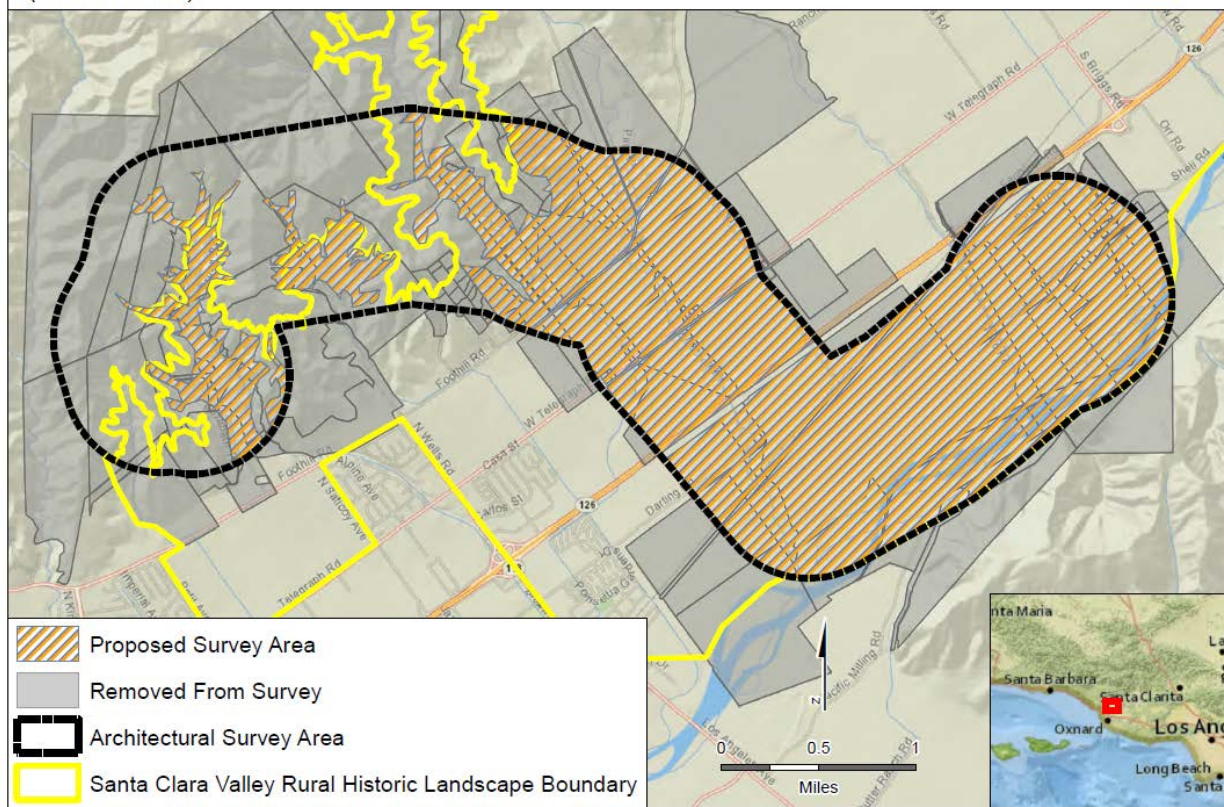
The applicant objected to completing the cultural resources windshield survey as described in Appendix B, largely on the basis that the survey area was too large and contained too many property owners for a cultural resources survey to be a reasonable undertaking. Staff has made a good faith effort to apply a set of criteria that reduces the survey area while still capturing the majority of cultural resources in the Project Area of Analysis (PAA).

These criteria include:

- Remove parcels included in the survey area which only slightly overlap with the PAA;
- Remove portions of parcels outside the PAA;
- Reduce the survey area by eliminating land with a slope unlikely to contain cultural resources that contribute to the historic landscape;
- Reduce the survey area by eliminating parcels with development not consistent (less than 45 years of age) with the built environment resources that contribute to the historic landscape.

However, if cultural resources are identified outside of the reduced survey area, staff reserves the right to analyze impacts to these resources at a later date and as part of its independent analysis of important contributors to the historic landscape. The following map represents the remaining survey area after applying the above criteria.

Reduced Architectural Survey Area
Mission Rock Energy Center
(15-AFC-02)



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Research and Survey Methodology

Staff and the applicant agreed to sharing of information with the goal of assisting the applicant in preparing a sufficient research design and survey methodology to provide staff with adequate information to identify historical resources and evaluate impacts. Staff has appended to Data Request 115 general guidelines and references for conducting a rural historic district identification and evaluation for the Mission Rock project.

DATA REQUEST No. 115

Provide a technical appendix to the Cultural Resources section of the AFC that includes the following elements:

- The results of an archaeological pedestrian survey of un-surveyed portions of the PAA where access has been delayed due to the presence of crops;
- Develop a research design and survey methodology for review and approval by staff. Research design and survey methodology should be based on and consistent with professional standards for survey and documentation of historical resources (See CEC Staff *General Guidelines*

for Conducting Historic Resources Survey for the Mission Rock Project). Research design and survey methodology may be submitted together or separately.

- A thematic historic context based on, and consistent with, professional standards for survey and documentation of historical resources. This task may require additional historical research at local repositories such as the Ventura County Museum research room, University of Santa Barbara map room and special collections, Santa Paula Oil Museum, or Liminoneira Company Archives.
- Request access in writing and verbally to any un-surveyed parcels in the revised survey area. Provide records of all attempts to contact property owners;
- The results of a historical resources survey, undertaken with the goal of documenting contributing resources to the Santa Clara Valley Rural Historic District (historic landscape) based on the revised survey area.
- Provide survey area map(s) that includes the following elements:
 - Survey area boundaries;
 - Locations of contributing historic farm clusters;
 - Locations of contributing linear features;
 - Locations of individual contributing landscape features;
 - Newly identified contributing and individually eligible historic resources;
 - Mission Rock and associated linear improvements (e.g. transmission, water supply and return, and gas line).

CEC Staff General Guidelines for Conducting Historic Resources Survey for the Mission Rock Project

Consistent with agreement reached at the data request resolution workshop held on September 23, 2016, staff provides general guidance for conducting cultural resources identification leading to the documentation of the rural historic landscape that overlaps with the project area. The following list represents the steps sufficient to gathering the information requested by staff in Data Request No. 115:

1. Review *Ventura County Cultural Heritage Survey Phase V: Western Santa Clara Valley* (1996) (especially sections on Historic Context, Survey Methodology, and Results) and determine broad research objectives, activities, and priorities
2. Draft and finalize Research Design (see Research Design and repository list).
3. Conduct Research (see Research Design).
4. Link research results to PAA (revised per workshop).
5. Draft and finalize Survey Methodology (see bibliography).
6. Contact property owners (see property owner contact protocol).
7. Access Properties and document cultural resources (see Survey Methodology).
8. Prepare technical appendix that includes research objectives, historic context statement(s), Research Design, research activity summary, Survey Methodology, property owner contact and access documentation, survey results, related survey maps, and new and updated DPR 523 forms that document contributing features to the historic landscape (per Data Request 115).

Research Design

The purpose of conducting historical research is to inform the development of a historic context that will inform the Survey Methodology. Background research is critical for identifying potential contributing features to the historic landscape. Useful sources that will help the research and survey team understand the history of the Santa Clara River Valley Rural Historic District include historic maps and plats, historic photographs, aerial photographs, census records, local and county histories, federal land grant records, homestead papers, deeds and wills, diaries, commercial records, newspapers, farm accounts and receipts, soil surveys, vegetation surveys, oral histories, local stories and folklore, and family records.

Gathering this information should be conducted in a systematic and organized fashion. Prior to conducting historical research it is important to develop a Research Design using the following steps:

1. Review the *Ventura County Cultural Heritage Survey Phase V: Western Santa Clara Valley* (1996) and develop guiding research questions.
2. Review readily available secondary sources (existing surveys, environmental documents for projects in the vicinity, county histories, corporate histories, family histories, etc.).
3. Develop a regional and cultural historic context for each known historical theme and any themes identified during review of secondary sources.
4. Identify Local Repositories (See repository contact list below).
5. Conduct additional primary and secondary source research at identified local repositories based on all historical themes (regional and site specific).
6. Develop district-specific historic context for each historical theme identified during background research.

Survey Methodology

The thematic historic contexts developed through background research are necessary for understanding which characteristics are associated with the district's primary activities, associations, and periods of development. Once the necessary thematic historic contexts have been completed, the survey work should be undertaken in the following steps:

Prior to Survey

1. Develop a set of resource typologies. Resource types should be linked to the thematic historic context for which they are important. The character defining features that make them important should be identified with enough detail to allow surveyors to identify these contributing elements in the field. Identify which eligibility criteria likely apply to each resource type.
2. Develop steps for contacting property owners and residents (see property owner contact protocol below).
3. Contact property owners and residents and document attempts to contact property owners.

Survey Strategy

1. Using historic and modern aerial photographs, identify as many resources as possible that may contribute to the landscape and note their locations for future fieldwork.

2. Gain access to as much acreage as possible on foot or by vehicle.
3. Travel all roadways, paved and unpaved.
4. Identify abandoned roadways, land use areas, homesites, canals, as well as those still in use through background research, and attempt to access those resources during survey work.

Documentation Strategy

1. Develop strategy for documenting contributing historic resources, including preparation of the necessary DPR forms (see California OHP Technical Assistance Series #13 for guidance).
2. Describe the resource with a corresponding identifier and mark the location on a field sketch map or digital mapping device. Major natural features, archeological sites, buildings, bridges, outbuildings, roadways, waterways, irrigation features, orchards, fields, pastures, mineral extraction features and sites, and boundary demarcations should be documented.
3. Identify vegetation that is predominant or related to significant land uses patterns
4. Date features as accurately as possible using background research and thematic historic context.
5. Record the condition of characteristics, noting evidence of historic field patterns, roadways, waterways, boundary markers, deteriorated and altered buildings and structures, ground disturbances, new land uses and construction, age and condition of vegetation, abandoned fields or roads, relocated farm structures, or abandoned equipment.
4. Note visible changes in the landscape by comparing historic and contemporary views provided by maps, illustrations, and photographs. Indicate changes to the historic boundaries of properties due to the intrusion of non-contributing characteristics such as subdivisions, consolidations, industrial growth not consistent with the rural historic district, or abandonment.

General Landscape Categories

It is important to understand and document how contributing features relate to the general categories of rural historic landscapes. These should be incorporated into the Survey Methodology and included on the survey form and documented for each contributing resource, as appropriate.

Land Use and Activities: Identify the major human forces and processes that form, shape, and organize patterns of land use.

Spatial Organization: Identify the overall pattern of landscape spatial organization, or the large-scale relationship among major components, major landforms, and natural features.

Natural Features: Identify how natural features in the region, such as mountains, rivers, creeks, and grasslands, influence both location and organization of rural landscape components.

Cultural Traditions: Identify any influence on land use practices, buildings and structure, ethnic or religious institutions, and community organization of the rural landscape.

Circulation Networks: Identify how circulation networks, such as trails, roads, railroads, and highways, influence the rural landscape.

Boundary Demarcations: Identify how boundary demarcations, as well as internal divisions within smaller segments of that landscape, divide the land.

Vegetation: Identify how vegetation relates to established land use patterns.

Building, Structures, and objects: Identify and classify structures according to their function, materials, and construction techniques.

Cluster Arrangement: Identify how the location of elements within the landscape relates to the overall organization of land.

Archeological Sites: Identify any archeological elements that contribute to the rural landscape.

Small-scale Elements: Identify any smaller, isolated, elements that may not be part of a larger system but appear to be contributors to the landscape.

Historic Integrity

Historic integrity is the composite effect of seven qualities:

1. **Location:** The place where the historic property was constructed or the place where the historic event occurred.
2. **Design:** The combination of elements that create the form, plan, space, structure and style of a property.
3. **Setting:** The physical environment of a historic property.
4. **Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. **Workmanship:** The physical evidence of the craft of a particular culture or people during any given period in history or prehistory.

6. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.
7. Association: The direct link between an important historic event or person and a historic property.

Each resource identified during field survey should be evaluated for how it contributes to the overall integrity of the landscape. In addition, each contributing feature should be evaluated based on the seven aspects of integrity.

Documentation should support the professional judgment of whether the resource today reflects the spatial organization, physical components, and historic associations that it attained during the period of significance.

Repository List

California Oil Museum

1001 E Main Street
Santa Paula, CA 93060
Contact: Jeanne Orcutt, Director
805-993-0076 x292
info@caoilmuseum.org

Limoneira Company Archives

1141 Cummings Road
Santa Paula, CA 93060
Contact: Alex Teague
805-525-5541
AMTeague@limoneira.com

Museum of Ventura County

100 E Main Street
Ventura, CA 93001
Contact: Charles Johnson, Director of the Research Library and Publications
805-653-0323 x320
library@venturamuseum.org

University of California Santa Barbara Map and Image Library

UC Main Library
UC Santa Barbara
Santa Barbara, CA 93106
Contact: Ann Hefferman
805-893-2478
ahefferman@ucsb.edu

Property Owner Contact Protocol

1. Obtain parcel/property owner information;
2. Draft letter to property owner:
 - a. Greetings, Salutations, To Current Property Owner;
 - b. Clear indication of the project;
 - c. If research indicates that a property contains a likely contributor to the Santa Clara Valley Rural Historic District, then that should be called out as a specific area of interest;
 - d. Purpose and need for gaining access;
 - e. Identification of any portions of the property where access is needed;
 - f. Clear point of contact information;
 - g. Letter should not be confused with other project information;
3. Send Letters via Certified Mail;
4. Wait 1 week and if no contact is made, visit the residence of property owner to request access. If only P.O. Box is known visit residence, if applicable;
5. For all letters that are returned to sender, contact Ventura County Assessor and request accurate property owner information;
6. When making house visits, be prepared with script of the purpose and need for access. Be prepared for instances where residents do not speak English;
7. Document on an excel spreadsheet all steps of the process.

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